

Rebecca K. Skiba  
Group Counsel  
Law-Regulatory Compliance

Marathon Oil Company  
5555 San Felipe Street  
Houston, TX 77056

Telephone: 713/296-2584  
Mobile: 713/962-9058  
Fax: 713/513-4425  
Email: [rkskiba@marathonoil.com](mailto:rkskiba@marathonoil.com)



September 12, 2014

Marvin Benton  
Assistant Regional Counsel  
U.S. Environmental Protection Agency  
Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733  
[benton.marvin@epa.gov](mailto:benton.marvin@epa.gov)

Dear Mr. Benton:

The purpose of this letter is to respond to EPA's letter to Marathon Oil Company dated July 28, 2014 (EPA Notice Letter) alleging Potentially Responsible Party (PRP) status with respect to the Wilcox Oil Superfund Site in Creek County, Oklahoma (Site). This letter indicates that EPA believes that Marathon Oil Company is a PRP as the successor to "Marathon Oil Company," which leased a crude oil tank at the site in 1936 (1936 Marathon Oil Company). As we discussed earlier this month, Marathon Oil Company separated its upstream and downstream businesses into two separate companies – Marathon Oil Company (MOC) and Marathon Petroleum Company (MPC) in 2011. At this point, and given the paucity of information tying either company to the Site, we have not been able to determine whether MOC or MPC should take the lead on this matter. Therefore, MOC will continue to correspond with EPA on this matter until such time as a final decision can be made as to which company will handle this matter.

While we are not unwilling to continue good faith negotiations with EPA on this matter, we would like to understand further why EPA believes Marathon Oil Company to be a PRP with respect to the Site. We were not provided with any evidence that we owned or operated the refineries that appear to have caused the contamination. Therefore, we would appreciate further discussion with EPA on our alleged liability with respect to the Site. I can be reached at 713-296-2584 or [rkskiba@marathonoil.com](mailto:rkskiba@marathonoil.com) to discuss further, and would welcome the opportunity to have a better understanding of EPA's position in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Skiba" followed by "on behalf of".

Rebecca Skiba

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